

EXHIBIT F

Volume III
Pages 1-64

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 03-12551-NG

FRANK SACO,	:
Plaintiff,	:
	:
vs.	:
	:
TUG TUCANA and	:
TUG TUCANA CORPORATION,	:
Defendants.	:

CONTINUED DEPOSITION of FRANK SACO, taken on behalf of the Defendants, pursuant to the applicable provisions of the Massachusetts Rules of Civil Procedure, before Barbara M. Montijo, a Registered Professional Reporter and Notary Public within and for the Commonwealth of Massachusetts, at the offices of Clinton & Muyzka, P.C., One Washington Mall, Boston, Massachusetts, on October 30, 2006, commencing at 2:00 p.m.

DUNN & GOUDREAU
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ORIGINAL

1 Q. When you say our doctors, who are you referring
2 to?

3 A. Dr. Chiodo, Dr. Rudicel. The last guy I saw
4 there up in Newton.

5 Q. What are you disabled from, sir?

6 A. My foot. I can't spend any time on it. The one
7 I didn't break.

8 Q. So, from April 2003 until May of 2006, you had
9 no gainful employment?

10 A. No.

11 Q. And you're saying that the doctors that you
12 treated with or you saw for examinations
13 completely disabled you from working?

14 A. Unless I could do something in a sedentary
15 position.

16 Q. What do you understand to be a sedentary
17 position?

18 A. Sitting.

19 Q. Did you ever seek out a job --

20 A. Yes.

21 Q. -- that required sitting?

22 A. Yes.

23 Q. What job is that, sir?

24 A. Security guard.

1 Q. When was that?

2 A. You know what, I don't -- Minuteman Security. I
3 don't know where their home office is, but the
4 guy lived in Lynnfield. He interviewed me. I
5 filled out an application. He sent me down to
6 get a uniform and never called me. I called him
7 three or four times.

8 Q. Did he ever call you back?

9 A. No. He called me once to tell me he was going
10 to be lining some things up. He'd get in touch;
11 that was about four months ago.

12 Q. What is that gentleman's name?

13 A. You know, I don't know if I've got his card in
14 here or not (Witness perusing wallet). You know
15 what -- no. Joe something. That's all I can
16 tell you. Minuteman Security. I do know that
17 was the name.

18 Q. Do you know what Joe's position was there?

19 A. He's the owner. He lived in Lynnfield, that's
20 all I can really give you. On the Lynnway. Not
21 the Lynnway, Fellsway.

22 Q. And you mentioned this was in the last four
23 months that you sought out Joe from Minuteman
24 Security?

1 A. Yeah, somebody -- a friend of mine had a job
2 with him, recommended me. He said he needed
3 someone. I called him. He called me in for an
4 appointment, interview. I filled out an app and
5 I haven't heard anything from him in over two
6 months, two-and-a-half months. I called him
7 like three or four times, left messages. He
8 called me once, maybe twice. He hasn't called
9 me in the last ten weeks.

10 Q. Is that the only other job you've sought out?

11 A. It's the only one I thought I'd be able to do.
12 It was 11 at night to 7 in the morning
13 sitting in my car. I think it was like three
14 shifts a week.

15 Q. I think in your first deposition, way back
16 when, in April of '04, you talked about how you
17 used to drive a cab?

18 A. Yeah, in 1957. When I first got married. '59.

19 Q. But you can't drive a cab now?

20 A. I could. Sure, I could. If you can find me a
21 job. As far as lugging groceries and stuff, you
22 know...

23 Q. Have you tried to find another job other than
24 with Minuteman Security?